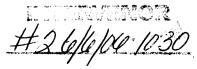
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# ELLIOTT & ELLIOTT, P.A.

# ATTORNEYS AT LAW

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selliott@elliottlaw.us

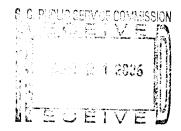


SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

April 18, 2006

Mr. Charles L.A. Terreni Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211



PRETURN DATE: OK O. Quke
SERVICE:

RE:

Annual Review of the Purchased Gas Adjustments & Purchasing Policies for South Carolina Pipeline Corporation

Docket No. 2006-6-G

Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served .

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I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the enclosed stamped self-addressed envelope. If you have questions, please do not hesitate to contact me.

Sincerely Yours,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/jcl Enclosures

cc: All parties of record (w/Encl.)

# STATE OF SOUTH CAROLINA

#### BEFORE THE PUBLIC SERVICE COMMISSION

# **DOCKET NO. 2006-6-G**

IN THE MATTER OF:	
South Carolina Pipeline Corporation ) Annual Review of the Purchased Gas )	PETITION TO INTERVENE
Adjustments and Gas Purchasing Policies )	

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-836 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That on October 5, 1987, the Commission issued its Order No 87-1122 which requires the annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation (Pipeline).
- 2. The Commission has assigned Docket No. 2006-6-G to the referenced matter and set a hearing for June 28, 2006.
- 3. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.
- 4. That a number of members of SCEUC purchase and consume substantial amounts of natural gas from Pipeline.

5. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

6. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

7. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

8. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

Scott Elliott, Esquire Elliott & Elliott, P.A. 721 Olive Street Columbia, South Carolina 29205 Telephone: 803-771-0555

Fax: 803-771-8010

WHEREFORE, Petitioner prays for the following relief:

a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.

Scott Elliott, Esquire

ELLIOTT & ELLIOTT, P.A.

721 Olive Street

Columbia, S.C. 29205

(803) 771-0555

Attorney for the South Carolina Energy Users Committee

,5

Columbia, South Carolina April 18, 2006

# **CERTIFICATE OF SERVICE**

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

South Carolina Pipeline Corporation Annual Review of The

Purchased Gas Adjustments and Gas Purchasing Policies

DOCKET NO.:

2006-6-G

PARTIES SERVED:

K. Chad Burgess, Esquire

Willoughby & Hoefer

P. O. Box 8416

Columbia, SC 29202

Patricia B. Morrison, Esquire

SCE&G

Legal Department - 130 Columbia, SC 29218

Paul W. Dillingham, Esquire

Spencer & Spencer

P. O. Box 790

Rock Hill, SC 29731

Wendy B. Cartledge, Esquire

**ORS** 

P. O. Box 11263 Columbia, SC 29211

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA

**ENERGY USERS COMMITTEE** 

April 18, 2006

Jackie C. Livingston, Paralega